

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA
Plaintiff,

V.

HENRI BUCKNER
Defendant.

Hon. Thomas L. Ludington
Case. No. 20-20434

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DEFENDANT'S UNOPPOSED MOTION FOR ESCORTED RELEASE TO
ATTEND GRADUATION CEREMONY

HENRI BUCKNER, by and through his attorney, Stefanie Lambert Junttila, respectfully moves the Court for an ORDER directing the United States Marshal Service to escort Mr. Buckner to attend his daughter, Caniyia Buckner, at the

University of Michigan, in Flint, Michigan on December 19, 2021. In support thereof, it is stated:

1. On April 6, 2021, Mr. Buckner appeared before the Honorable Patricia Morris and plead guilty to Count 4 of the above captioned indictment. Count 4 charged Mr. Buckner with Distribution of Cocaine Base in violation of 21 U.S.C. §841(a)(1) and 841(b)(1)(B)(iii).
2. Presently, Mr. Buckner is scheduled to be sentenced on March 17, 2022.
3. Presently, Mr. Buckner is in custody at the Livingston County Jail located in Howell, Michigan. Mr. Buckner has been incarcerated since his arrest in this case on September 22, 2020.
4. Mr. Buckner has attended his daughter Caniyia Bucker's previous graduation ceremonies. Caniyia is the first Buckner family member to graduate from college and wishes to have her father present to support and witness her graduation ceremony.
5. Mr. Buckner will comply with all court conditions, including but not limited to GPS monitoring, and Mr. Buckner will pay for the expenses incurred for the services of the United States Marshalls.
6. Mr. Buckner respectfully requests the ability to watch the ceremony by video/internet in the event this Honorable Court is not inclined to allow him to attend the ceremony in person.
7. Timothy Turkelson, Assistant United States Attorney assigned to this case, has informed counsel that he does not oppose this request if Mr. Buckner is escorted

to the graduation ceremony by the United States Marshalls. Mr. Buckner cried upon learning

WHEREFORE, it is respectfully requested this Court issue an ORDER directing the Livingston County Jail to arrange for Mr. Buckner to be escorted to the University of Michigan in Flint, Michigan to attend his daughter's graduation.

Respectfully submitted,

Stefanie Lambert Junttila P71303
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Dated: December 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

/s/STEFANIE LAMBERT JUNTILA

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Dated: December 6, 2021

